REMARKS

I. Introduction

Claims 1-19 and 32-34 are pending in the present application. In an October 5, 2005, Office Action (herein "Office Action"), Claims 1-7, 9-11, and 32-34 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,128,016 to Coelho et al. (herein "Coelho"). Claims 8 and 12-19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Coelho in view of U.S. Patent No. 5,815,152 to Collier et al. (herein "Collier").

II. Claim Rejections

A. Introduction

Claims 1-7, 9-11, and 32-34 were rejected under 35 U.S.C. § 102(e) as being anticipated by Coelho. Claims 8 and 12-19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Coelho in view of Collier.

For the following reasons, applicants respectfully submit that the rejected claims of the present application are not anticipated or rendered obvious over Coelho and Collier because the cited and applied references, either alone or in combination, fail to teach or suggest "displaying a set of graphical action icons for selection by a user, wherein each action icon is representative of one or more actions to be executed by a computing device." Further, applicants respectfully submit the references fail to teach or suggest "instructing each networked computing device represented by a selected graphical computing device icon to execute the instructions represented by the selected graphical action icon."

Prior to discussing more detailed reasons why applicants believe that all of the claims of the present application are allowable over the cited references, a brief description of the present invention and the cited references is presented.

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1. Summary of the Present Invention

The present application is generally related to a system and method for controlling a number of computing devices, such as servers, from a central control computer by manipulating a common graphical user interface ("GUI"). More particularly, the GUI generates a set of graphical icons representative of a group of computing devices within a network that will be managed and a set of graphical action icons representative of computing device control parameters, or actions, that are to be executed by selected computing devices. A user of the GUI may select a computing device icon and/or an action icon and thereby implement the actions represented by the selected action icon on each of the computing devices represented by the selected computing device icons.

In one example of the present invention, a user may select several server icons (representing a group of servers) and an action icon that represents control parameters relating to the collection of performance monitoring data for the selected servers. Upon selection of the action icons for selected servers, those actions are automatically executed on each of the selected servers. In particular, the server control computer, upon receipt of a selection of servers and actions, generates and issues a template to each of the selected servers containing information to initiate the selected actions.

Thus, the present invention provides the ability to control several networked computing devices, located at geographically distinct sites, from a common location.

2. U.S. Patent No. 6,128,016, to Coelho

Coelho is purportedly directed toward a graphical user interface ("GUI") for monitoring and displaying information pertaining to the components and subcomponents of a single server. *See* Coelho, Col. 13, lines 11-17; Col. 16, lines 17-21; Figure 3. Coelho further teaches that the component categories and associated subcomponent categories are displayed as icons within a

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hierarchical navigation model. Col. 8, lines 34-42; Figure 3, Levels 1 and 2. Still further, Coelho teaches that a user may traverse through the component and subcomponent areas of a single server by selecting the displayed category icons. Col. 8, lines 35-39; Figure 3. Even further, Coelho teaches that selecting an icon triggers the navigation model to display either a next level of the selected component category or a dialog screen containing information. Col. 8, lines 40-42; Figure 3.

Specifically, Coelho teaches icons representative of a single server (Col. 8, lines 56-58; Figure 3, Root Level 0), icons representative of the major components within a single server (Col. 8, lines 59-67; Figure 3, Level 1), icons representative of subcomponents within a single server (Col. 9, lines 1-14; Col. 9, line 44-Col. 10, line 9; Figure 3, Level 2), and leaf-node icons representative of the elements of a single server (Col. 16, lines 26-44; Figure 3, Level 3). Further, Coelho teaches that the parent node icons (Levels 0, 1, and 2 in Figure 3) result in no action when double-clicked, while double-clicking on a leaf node icon (Level 3 in Figure 3) results in the opening of a dialog box. Col. 21, lines 35-40.

As an example of the information provided by the GUI taught in Coelho, a user may view a dialog box containing information related to a specific processor in a specific server by first selecting the associated server icon 30, then selecting a configuration icon 30-1, then selecting a processor icon 30-12, and then selecting an icon representing the specific processor 30-32a for which the user desires information. Col. 8, line 53-Col. 9, line 7; Col. 9, lines 44-58; Figure 3. As taught in Coelho, the icon representing a specific processor is known as a "leaf node" and selecting it triggers the display of a dialog screen containing information about the specific processor. Col. 16, lines 34-40, Col. 9, lines 53-56; Figure 3, Figure 5G.

Coelho clearly fails to teach or suggest a method of providing a computing device control interface for centrally controlling a plurality of networked computing devices. Further, Coelho

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fails to teach or suggest displaying a set of graphical action icons for selection by a user, wherein each action icon is representative of one or more actions to be executed by a computing device. Still further, Coelho fails to teach or suggest obtaining a selection of a graphical action icon. Even further, Coelho fails to teach or suggest instructing each networked computing device represented by a selected graphical computing device icon to execute the instructions represented by the selected graphical action icon. Still further, Coelho fails to teach or suggest at least one graphical action icon in a set of graphical action icons that includes an action to implement a collection template for capacity planning.

Further, Coelho fails to teach or suggest a method for centrally controlling a plurality of networked computing devices. Further, Coelho fails to teach or suggest displaying a group of actions as an action icon and displaying a group of networked computing devices as a computing device icon on a display. Still further, Coelho fails to teach or suggest instructing each networked computing device represented by a computing device icon to execute the groups of actions represented by an action icon upon a selection of the computing device icon with a user interface device.

3. U.S. Patent No. 5,815,152, to Collier

Collier is purportedly directed toward a method and apparatus for graphically defining a rule to be evaluated by a computer system. *See* Collier, Col. 1, lines 9-11. As described in Collier, "[a] rule is a set of criteria that is enforced in a case. A case is an individual instance of work to be performed for a business purpose—a collection of information organized by folder, documents, and forms." Col. 1, lines 17-20. Rules are assigned to workflow systems, such as a project management system or tracking system. Col. 3, lines 24-31. The rules each contain one or more conditions which evaluate to one of several values, such as True or False. Actions for a rule are defined based on the result of the condition. Col. 3, lines 45-54. Although, a user is

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allowed to create multiple rules (Col. 4, line 66), each rule icon only represents a single rule with an associated rule name and rule description. Col. 5, lines 6-16.

Collier fails to teach or suggest a method for centrally controlling a plurality of networked computing devices. Further, Collier fails to teach or suggest displaying a group of actions as an action icon and displaying a group of networked computing devices as a computing device icon on a display. Still further, Collier fails to teach or suggest instructing each networked computing device represented by a computing device icon to execute the groups of actions represented by an action icon upon a selection of the computing device icon with a user interface device.

B. The Claims Distinguished

1. 35 U.S.C. § 102(e) Rejections

a. Independent Claim 1

For purposes of this discussion, Claims 1 and 32 will be discussed together because the limitations discussed herein are similar for each claim. Claim 1 reads as follows:

> 1. A method of providing a computing device control interface for centrally controlling a plurality of networked computing devices, the method comprising:
>
> displaying a set of graphical action icons for selection by a user, wherein each action icon is representative of one or more actions to be executed by a computing device;
>
> displaying a set of graphical computing device icons wherein each graphical computing device icon is representative of one or more networked computing devices;
>
> obtaining a selection of a graphical action icon;
>
> obtaining a selection of a graphical computing device icon; and
>
> instructing each networked computing device represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon.

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Similarly, Claim 32 reads as follows:

> 32. A method of providing a server control interface for centrally controlling a plurality of networked servers, the method comprising:
>
> displaying a set of graphical action icons for selection by a user, wherein each action icon is representative of one or more actions to be executed by one or more servers, and wherein at least one graphical action icon in the set of graphical action icons includes an action to implement a collection template for capacity planning;
>
> displaying a set of graphical server icons wherein each graphical server icon is representative of one or more networked servers;
>
> obtaining a selection of a graphical action icon;
>
> obtaining a selection of a graphical server icon; and
>
> instructing each networked server represented by the selected graphical server icon to execute the instructions represented by the selected graphical action icon.

As described above, Claim 1 recites "a method of providing a computing device control interface for centrally controlling a plurality of networked computing devices." Similarly, Claim 32 recites "a method of providing a server control interface for centrally controlling a plurality of networked servers." Claim 1 further recites "displaying a set of graphical action icons for selection by a user, wherein each action icon is representative of one or more actions to be executed by a computing device." Similarly, Claim 32 recites "displaying a set of graphical action icons for selection by a user, wherein each action icon is representative of one or more actions to be executed by one or more servers." Further, Claim 32 adds a limitation that "at least one graphical action icon in the set of graphical action icons includes an action to implement a collection template for capacity planning."

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Still further, Claim 1 recites "displaying a set of graphical computing device icons wherein each graphical computing device icon is representative of one or more networked computing devices." Similarly, Claim 32 recites "displaying a set of graphical server icons wherein each graphical server icon is representative of one or more networked servers." Even further, Claims 1 and 32 each recite "obtaining a selection of a graphical action icon." Still further, Claim 1 recites "obtaining a selection of a graphical action icon" while Claim 32 similarly recites "obtaining a selection of a graphical server icon." Still further, Claim 1 recites "instructing each networked computing device represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon." Similarly, Claim 32 recites "instructing each networked server represented by the selected graphical server icon to execute the instructions represented by the selected graphical action icon."

The control interface of Claims 1 and 32 provides the ability for a network administrator to perform actions on several computing devices on the network from a central location, without having to manually go to each computing device and perform the actions. In particular, the interface provides the ability for a user (administrator) to select several computing devices, such as servers, on the network, each being represented by a computing device icon, and assign actions to each of the selected computing devices. Those actions are then automatically executed by the selected computing devices. Thus, the methods of Claims 1 and 32 provides the ability to easily control an entire network of computing devices from a central location.

The Office Action asserts that Coelho teaches each of the elements of Claims 1 and 32. *See* Office Action, pp. 2-3. However, in contrast to the Claims of the present application, Coelho is directed towards a graphical user interface ("GUI") for monitoring and displaying information pertaining to the components and subcomponents of a single server. *See* Coelho, Col. 13,

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lines 11-17; Col. 16, lines 17-21; Figure 3. Coelho teaches that the component categories and associated subcomponent categories are displayed as icons within a hierarchical navigation model. Col. 8, lines 34-42; Figure 3, Levels 1 and 2. Coelho further teaches that a user may traverse through the component and subcomponent areas of a single server by selecting the displayed category icons. Col. 8, lines 35-39; Figure 3. Still further, Coelho teaches that selecting an icon triggers the navigation model to display either a next level of the selected component category or a dialog screen containing information. Col. 8, lines 40-42; Figure 3.

As an example of the information provided by the GUI taught in Coelho, a user may view a dialog box containing information related to a specific processor in a specific server by first selecting the associated server icon 30, then selecting a configuration icon 30-1, then selecting a processor icon 30-12, and then selecting an icon representing the specific processor 30-32a for which the user desires information. Col. 8, line 53-Col. 9, line 7; Col. 9, lines 44-58; Figure 3. As taught in Coelho, the icon representing a specific processor is known as a "leaf node" and selecting it triggers the display of a dialog screen containing information about the specific processor. Col. 16, lines 34-40, Col. 9, lines 53-56; Figure 3.

Applicants respectfully submit that Coelho does not teach "displaying a set of graphical action icons for selection by a user, wherein each action icon is representative of one or more actions to be executed by a computing device" as recited in Claim 1. Likewise, Coelho does not teach "displaying a set of graphical action icons for selection by a user, wherein each action icon is representative of one or more actions to be executed by one or more servers, and wherein at least one graphical action icon in the set of graphical action icons includes an action to implement a collection template for capacity planning" as recited in Claim 32. As taught in Coelho, "only one server is monitored at any given time." Col. 13. lines 13-17. Accordingly, Coelho teaches icons representative of single servers (Col. 8, lines 56-58; Figure 3, Root Level

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0), icons representative of the major components within a single server (Col. 8, lines 59-67; Figure 3, Level 1), icons representative of subcomponents within a single server (Col. 9, lines 1-14; Col. 9, line 44-Col. 10, line 9; Figure 3, Level 2), and leaf-node icons representative of the elements of a single server (Col. 16, lines 26-44; Figure 3, Level 3).. Thus, the icons taught in Coelho are representative of devices as opposed to actions. Because Coelho does not teach displaying a set of graphical action icons for selection by a user, Coelho cannot further teach the additional limitation of Claim 32 that "at least one graphical action icon in the set of graphical action icons includes an action to implement a collection template for capacity planning."

Because of the limitations discussed above, Coelho cannot teach "instructing each networked computing device represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon" as recited in Claim 1. Likewise, Coelho does not teach "instructing each networked server represented by the selected graphical server icon to execute the instructions represented by the selected graphical action icon" as recited in Claim 32. Rather, Coelho teaches that:

> ...only leaf elements of the tree structure are given action codes other than "**0**". Thus, as described, double clicking on any parent node causes application 10-6 to take no action while double clicking on any leaf node causes application 10-6 to bring up a dialog box.

Coelho, Col. 21, lines 35-40. Thus, Coelho teaches that the parent node icons (Levels 0, 1, and 2 in Figure 3) result in no action when double-clicked. Further, double-clicking on a leaf node icon (Level 3 in Figure 3) merely results in the opening of a dialog box. Thus, not only are the icons taught in Coelho representative of devices, but only the leaf node icons are associated with an action. Further, the action associated with a leaf node, opening a dialog box, merely involves execution of <u>local</u> code. Thus, Coelho clearly does not teach "instructing each <u>networked</u>

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computing device" or "instructing each networked server" to "execute the instructions represented by the selected graphical action icon" as recited in Claims 1 and 32 respectively.

To anticipate a claim under § 102(e), the cited reference must teach each and every element recited in the claim. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987). With regard to Claim 1, applicants respectfully submit that the cited references, Coelho and Collier, fail to teach at least "displaying a set of graphical action icons for selection by a user, wherein each action icon is representative of one or more actions to be executed by a computing device" as recited in the claim. With regard to Claim 32, applicants respectfully submit that the cited references, Coelho and Collier, fail to teach at least "displaying a set of graphical action icons for selection by a user, wherein each action icon is representative of one or more actions to be executed by one or more servers, and wherein at least one graphical action icon in the set of graphical action icons includes an action to implement a collection template for capacity planning" as recited in the claim. For these reasons, applicants respectfully request a withdrawal of the § 102(e) rejection with regard to Claims 1 and 32 and allowance of the claims.

b. Independent Claim 12

Claim 12 reads as follows:

> 12. In a computer system having a display and at least one graphical user interface selection device, a method of providing a server control interface for centrally controlling a plurality of computing devices, the method comprising:
>
> obtaining an identification of a group of actions to be executed by a plurality of networked computing devices;
>
> displaying the group of actions as an action icon on the display;
>
> obtaining an identification of a group of networked computing devices to be controlled;

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displaying the group of networked computing devices as a computing device icon on the display;

obtaining a selection of the action icon by the selection device; and

instructing each networked computing device represented by the computing device icon to execute the groups of actions represented by the action icon upon a selection of the computing device icon with the user interface device.

As described above, Claim 12 recites "a method of providing a server control interface for centrally controlling a plurality of computing devices." Further, Claim 12 recites "obtaining an identification of a group of actions to be executed by a plurality of networked computing devices" and "displaying the group of actions as an action icon on the display." Still further, Claim 12 recites "obtaining an identification of a group of networked computing devices to be controlled" and "displaying the group of networked computing devices as a computing device icon on the display." Even further, Claim 12 recites "obtaining a selection of the action icon by the selection device" and "instructing each networked computing device represented by the computing device icon to execute the groups of actions represented by the action icon upon a selection of the computing device icon with the user interface device." Thus, the control interface of Claim 12 provides the ability for a network administrator to execute a group of actions across a group of networked computing devices by selecting an action icon and a computing device icon.

The Office Action admits that Coelho does not teach "displaying the group of actions as an action icon on the display and a group of networked computing devices as a computing device icon on the display." *See* Office Action, p. 5. Further, the Office Action admits that Coelho does not teach "instructing each networked computing device represented by the computing device icon to execute the groups of actions represented by the action icon upon." *Id.* However, the Office Action asserts that Collier resolves these deficiencies by describing a "condition leg,

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which may have a series of action objects," that a "user may create multiple rules, which are represented by a single icon," and that a user "can add more conditions to a rule." *Id.* at pp. 5-6. Thus, the Office Action appears to assert that the combination of Coelho and Collier would have been obvious to one with ordinary skill in the art at the time the invention was made to modify Coelho's interface to include Collier's teachings. *Id.* at pp. 5-6.

In contrast to the claims of the present application, Coelho and Collier do not describe a method of providing a server control interface for centrally controlling a plurality of computing devices. Referring first to Coelho, as described above in relation to Claim 1, Coelho teaches a GUI for displaying information related to the components and subcomponents, such as a processor or memory board, of a single server. *See* Coelho, Col. 9, lines 53-56; Col. 9, line 59-Col. 10, line 8; Col. 13, lines 13-17; Figure 3. As discussed above, the icons taught in Coelho are representative of devices as opposed to actions. Col. 8, lines 56-58; Col. 8, lines 59-67; Col. 9, lines 1-14; Col. 9, line 44-Col. 10, line 9; Figure 3. Thus, Coelho clearly does not teach "obtaining a selection of an action icon by a selection device" as recited in Claim 12.

Collier, also in contrast to the claims of the present application, is directed to a method and apparatus for graphically designing and displaying a rule to be evaluated by a workflow system for determining actions to be taken by the system when processing a particular occurrence of a system entity. The Office Action acknowledges that Coelho fails to teach "displaying a group of actions as an action icon on a display and a group of networked computing devices as a computing device icon on the display." *See* Office Action, p. 5. Further, the Office Action admits that Coelho does not teach "instructing each networked computing device represented by the computing device icon to execute the groups of actions represented by

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the action icon upon." *Id.* However, the Office Action does not assert that Collier satisfies this deficiency. The Office Action only asserts that:

> Collier teaches a condition leg, which may have a series of action objects (Col. 7, lines 22-35). Collier teaches that the user may create multiple rules, which are represented by a single icon (Col. 3, lines 42-54; Col. 4, lines 55-67); can add more conditions to a rule (Col. 5, lines 17-34; Col. 7, lines 7-8, 22-40).

Office Action, pp. 5-6.

Applicants assert that the limitation of instructing each computing device to execute a group of actions is not disclosed in Collier. Collier is limited to a method for graphically displaying and defining a rule to be evaluated by a workflow system. There is no discussion in Collier of a computing device control interface for centrally controlling a plurality of networked computing devices. Likewise Collier does not teach or suggest instructing each computing device represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon.

Applicants further assert that the limitations of "displaying a group of actions as an action icon on a display and a group of networked computing devices as a computing device icon on the display" is also not disclosed by Collier. Collier merely teaches that each rule icon only represents a single rule with an associated rule name and rule description. *See* Collier, Col. 5, lines 6-16. Because each rule icon corresponds to a single rule, instantiation of multiple rules requires manipulation of multiple icons. Therefore, Collier clearly does not teach Claim 12's limitations of "displaying the group of actions as an action icon on the display" or "displaying the group of networked computing devices as a computing device icon on the display."

Generally described, under 35 U.S.C. § 103(a), a *prima facie* case of obviousness can be established only if the cited references, alone or in combination, teach each and every element recited in the claim. *In re Bell*, 991 F2d 781 (Fed. Cir. 1993). With regard to Claim 12,

applicants respectfully submit that the cited references, Coelho and Collier, alone or in combination, fail to teach or suggest at least: (1) "a control interface for centrally controlling a plurality of networked computing devices"; or (2) "instructing each networked computing device represented by the computing device icon to execute the groups of actions represented by the action icon upon a selection of the computing device icon with the user interface device" as recited in the claim. For these reasons, applicants respectfully request a withdrawal of the § 103(a) rejection with regard to Claim 12 and allowance of the claim.

c. Dependent Claim 6

Claim 6 was rejected under 35 U.S.C. § 102(e) as being anticipated by Coelho. Claim 6 is dependent upon Claim 1. As discussed above, Coelho (as well as Collier) fail to teach or suggest each of the limitations recited in Claim 1. Accordingly, for the above-mentioned reasons, Claim 6 is likewise allowable over Coelho (as well as Collier). In addition, Claim 6 further adds the following limitation:

> wherein at least one graphical action icon in the set of graphical action icons implements a collection template for capacity planning in the one or more networked computing devices represented by the selected graphical computing device icon.

The Office Action asserts that Coelho teaches this limitation because Coelho teaches "action icons and a navigation model (template) for requesting information, setting values, and managing (planning) devices." Office Action, pp. 3-4. In support of the position, the Office Action cites the abstract, Col. 8, lines 33-42; Col. 10, lines 63-67 and Col. 11, lines 1-18 of Coelho as teaching the limitation recited in Claim 6.

However, the cited sections of Coelho, or any other portion of Coelho, do not disclose or teach the limitation of Claim 6. As discussed above, the graphical action icons described in the present application represent actions that are to be executed by each computing device

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represented by the selected graphical computing device icon. As recited in Claim 6, one of those actions is implementing a collection template for capacity planning. Instructing a networked computing device to implement a collection template for capacity planning is distinct from traversing a hierarchical navigation model to obtain information on a component or subcomponent of a server.

As discussed above, Coelho is limited to teaching a hierarchical navigation model including icons representative of components and subcomponents of a server. Col. 8, lines 53-67; Figure 3. Coelho does not discuss or describe wherein at least one graphical action icon in the set of graphical action icons implements a collection template for capacity planning in the one or more networked computing devices represented by the selected graphical computing device icon.

Thus, in addition to the reasons presented with respect to Claim 1, applicants respectfully request withdrawal of the § 102(e) rejection of Claim 6 and allowance of the claim.

d. Dependent Claims 2-5, and 7-11

Claims 2-5, and 7-11 are dependent on Claim 1. As discussed above, Coelho and Collier fail to teach or suggest each of the limitations recited in Claim 1. Accordingly, for the above-mentioned reasons, Claims 2-5, and 7-11 are likewise allowable over the cited art. In addition, Claims 2-5, and 7-11 further add to the patentability and nonobviousness of the claims. For these reasons, applicants respectfully request withdrawal of the § 102(e) and § 103(a) rejections of Claims 2-5 and 7-11 and allowance of the claims.

e. Dependent Claims 13-19

Claims 13-19 are dependent on Claim 12. As discussed above, Coelho and Collier fail to teach or suggest each of the limitations recited in Claim 12. Accordingly, for the above-mentioned reasons, Claims 13-19 are likewise allowable over the cited art. In addition,

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Claims 13-19 further add to the nonobviousness of the claims. For these reasons, applicants respectfully request withdrawal of the § 103(a) rejections of Claims 13-19 and allowance of the claims.

f. Dependent Claims 33-34

Claims 33-34 are dependent on Claim 32. As discussed above, Coelho and Collier fail to teach or suggest each of the limitations recited in Claim 32. Accordingly, for the above-mentioned reasons, Claims 33-34 are likewise allowable over the cited art. In addition, Claims 33-34 further add to the patentability of the claims. For these reasons, applicants respectfully request withdrawal of the § 102(e) rejections of Claims 33-34 and allowance of the claims.

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III. Conclusion

Based on the above-referenced arguments, applicants respectfully submit that all of the pending claims of the present application, Claims 1-19 and 32-34, are allowable over the cited and applied references. Accordingly, applicants respectfully request withdrawal of all the rejections of the claims of the present invention and allowance of the present application. If any questions remain, applicants request that the Examiner contact the undersigned at the telephone number listed below.

Respectfully submitted,

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